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JUN 12 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

1875 CONNECTICUT AVENUE, N.W.  
SUITE 1200  
WASHINGTON, DC 20009B5728

June 12, 2001

**VIA MESSENGER**

Magalie R. Salas, Secretary  
Federal Communications Commission  
445 12 Street, S.W.  
Washington, DC 20554

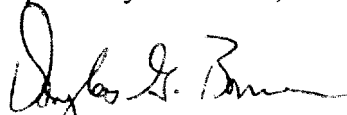
Re: Joint Petition of BellSouth, SBC, and the Verizon Companies  
or Elimination of Mandatory Unbundling of High-Capacity Loops  
and Dedicated Transport ("Joint Petition"), CC Docket No. 96-98 /

Dear Ms. Salas:

By undersigned counsel, Nextel Communications, Inc. hereby submits the original and seven (7) copies of a revised page 6 of its Comments filed June 11, 2001 in the above proceeding. This revised page 6 corrects errata appearing on the originally filed page 6, and does not change any of the substantive argument presented in Nextel's initial comments. This revised page 6 replaces the original in its entirety.

By copy of this filing, we are serving all parties to have filed initial comments. Please do not hesitate to contact us if you have any questions on this matter.

Respectfully submitted,



Douglas G. Bonner  
Elizabeth Dickerson

Enclosure

cc: Michelle Carey  
Interested Parties

No. of Copies rec'd 0  
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The overriding assumption that only business customers in urban areas generally require access to high-capacity loops and dedicated transport completely ignores the entire industry of CMRS providers who do not market exclusively to businesses, but instead collectively offer true competitive choices to residential consumers as well. To the extent residential, suburban, or even rural, end users no longer subscribe to their incumbent local phone company, more often than not, it is because they subscribe to cellular service, and not because they obtain wireline service from a CLEC. The ILECs are attempting to throw out the independent CMRS industry with the bath water by focusing their analysis on purely business use of UNEs. By offering alternatives to traditional land-line-based local service, however, CMRS carriers are achieving the goal of Congress in adopting the 1996 Act to benefit “all Americans by opening all telecommunications markets to competition.”<sup>12</sup> It is incumbent upon the Commission to prevent this significant competitive market segment

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<sup>9</sup> Crandall Declaration at 14.

<sup>10</sup> Fact Report at 9.

<sup>11</sup> *Id.* at 11. Although the Fact Report also concedes that “CLEC fiber is by no means limited to dense urban areas” (*id.*, p. 12), it does not quantify the urban/non-urban concentration of alternative networks, suggesting that non-urban installations are scarce, and that anecdotal comments served its theory better than quantification of the installations would.

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